

# EXHIBIT 14

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

ROBERT SAMPSON,

v.

STONY BROOK UNIVERSITY and  
MAURIE MCINNIS, in her official capacity  
as President of Stony Brook University

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CIVIL ACTION NO. 2:22-cv-04490-JMA

**DECLARATION OF MICHAEL STEVEN STEIN**

I, Michael Steven Stein, make the following declaration upon personal knowledge:

1. I am one of the attorneys representing Robert Sampson.
2. My *curriculum vitae* is attached as Exhibit A to this Declaration.
3. I graduated from Princeton University *summa cum laude* in 2003 with an A.B.

from the School of Public and International Affairs and was elected to membership in the Phi Beta Kappa Society.

4. I graduated from Harvard Law School in 2006. I was Notes Editor for the Harvard Law Review.

5. I clerked for the Honorable William G. Young in the United States District Court for the District of Massachusetts in 2006-2007.

6. I was a Skadden Fellow with the National Association of the Deaf (NAD) from 2007 through 2009.

7. During my time at NAD, I litigated a number of cases throughout the country on behalf of deaf and hard of hearing individuals against hospitals, law enforcement, courts, and banks. These cases were brought pursuant to the Americans with Disabilities Act, 42 U.S.C. § 12101 *et seq.*, and section 504 of the Rehabilitation Act, 29 U.S.C. § 794. For instance, I did oral argument before the Seventh Circuit in *Germano v. International Profit Ass'n*, 544 F.3d 798

(7th Cir. 2008). This was a case of first impression whether statements made through telecommunications relay services, a telephone service for deaf individuals, are admissible in court. Following oral argument, the Seventh Circuit ruled favorably for my client.

8. I also worked on policy issues and drafted comments in response to notices of proposed rulemaking by the Department of Justice with respect to ADA regulations. I participated in meetings discussing revisions to the ADA that resulted in the ADA Amendments Act of 2008.

9. In 2009, after completing my fellowship at the NAD, I co-founded the firm Stein & Vargas, LLP.

10. At Stein & Vargas, I have continued to litigate cases throughout the country on the behalf of individuals with disabilities, including cases against health care providers, universities, courts, state and local government entities, law enforcement, and correctional facilities.

11. I am admitted to practice law in Massachusetts, District of Columbia, New York, and Virginia. I am also admitted to the United States Courts of Appeals for the Second and Seventh Circuits. I am a member of the United States District Courts for the Eastern District of New York, the Northern District of New York, the Southern District of New York, the Western District of New York, the Eastern District of Virginia, the Western District of Virginia, the Eastern District of Michigan, and the District of North Dakota.

12. Due to the national scope of Stein & Vargas' practice and expertise in cases involving disability law issues, I have also been admitted *pro hac vice* in numerous courts throughout the country.

13. Representative cases include *Nat'l Ass'n of the Deaf v. State of Florida, et al.*, 980 F.3d 763 (11th Cir. 2020) (holding that a deaf plaintiff had valid claims against a state legislature for not captioning website content); *Argenyi v. Creighton University*, 703 F.3d 441 (8th Cir. 2013) (holding that medical schools must provide deaf students with educational opportunities equal to that of hearing students); *Enos v. State of Arizona, et al.*, No. CV-16-00384-PHX-JJT, 2017 WL 553039 (D. Ariz. Feb. 10, 2017) (holding that deaf plaintiffs had stated claims against 911 service providers for not accepting text messages that would make 911 accessible to deaf individuals); *Prakel v. State of Indiana*, 100 F. Supp. 3d 661 (S.D. Ind. 2015) (holding that state courts may be required to provide interpreters for deaf spectators); *Featherstone v. Pacific Northwest Univ.*, No. 1:CV-14-3084-SMJ, 2014 WL 3640803 (E.D. Wash. July 22, 2014) (granting preliminary injunction to deaf student denied admission to medical school on the basis of disability); *Mosier v. Commonwealth of Kentucky*, 675 F. Supp. 2d 693 (E.D. Ky. 2009) (case of first impression whether state courts must provide interpreters for deaf attorneys that resulted in a far-reaching settlement modifying court policy to provide interpreters for such attorneys); I have also litigated numerous cases on behalf of individuals with disabilities against employers, government agencies, hospitals, and businesses for discriminating on the basis of disability.

14. I have also worked on a number of cases specific to students who have been denied testing accommodations on board examinations. These have included cases involving the National Board of Medical Examiners and its osteopathic counterpart, the National Board of Osteopathic Medical Examiners. I was co-counsel on the leading case of *Ramsay v. Nat'l Bd. of Med. Exam'rs*, 968 F.3d 251 (3d Cir. 2020).

15. In addition to being partner with Stein & Vargas, I am also the executive director for Deaf Legal Advocacy Worldwide, a section 501(c)(3) organization that awards scholarships

to deaf leaders around the world to attend law school and advocate for the human rights of deaf individuals in their home countries. To date, Deaf Legal Advocacy Worldwide has awarded scholarships to deaf leaders in Chile, Democratic Republic of the Congo, Ghana, India, Indonesia, Nigeria, Peru, Uganda, and Zambia.

16. I have taught courses on disability law at Gallaudet University and at the Rochester Institute of Technology.

17. I have spoken nationally and internationally on the rights of individuals with disabilities pursuant to the Americans with Disabilities Act, the Rehabilitation Act, and the U.N. Convention on the Rights of Persons with Disabilities.

18. I have published scholarship on the Americans with Disabilities Act. *See* Michael Steven Stein & Emily Teplin, *Rational Discrimination and Shared Compliance: Lessons from Title IV of the Americans with Disabilities Act*, 45 Valparaiso U. L. Rev. 1095 (2011) (analyzing ADA noncompliance and proposes policy reforms for realigning economic incentives to increase compliance); *Comment District Court Approves Settlement Requiring Movie Theaters to Provide Closed Captioning for Deaf and Hard of Hearing People*, 118 HARV. L. REV. 1777 (2005) (analyzing settlement in movie theater captioning case).

19. Since Stein & Vargas' mission is to represent individuals with disabilities who experience discrimination on the basis of disability, we accept cases regardless of the client's ability to pay our hourly rate. The majority of our clients cannot afford to pay counsel. We litigate on a contingency basis and awards of attorneys' fees and costs are necessary for us to maintain our business model representing individuals with a disability – regardless of ability to pay our hourly rates -- who have suffered discrimination.

20. For those clients who can pay, my current hourly rate is \$450.00 per hour. This is a discounted rate that reflects the fact that even those clients who can afford to pay cannot afford to pay the rates in the Laffey Matrix, which sets an hourly rate of \$829 for attorneys with my years of experience in DC. *See* Laffey Matrix, [www.laffeymatrix.com/see.html](http://www.laffeymatrix.com/see.html) (last visited June 2, 2023).

21. In this case, my requested hourly rate for this case is \$425.00 per hour. This is an adjustment downward from my current hourly rate to accommodate rates typical in the Eastern District of New York for attorneys with my years of experience.

22. In this case, I was the lead author on briefs, researching and drafting the briefs in support of the motion for preliminary injunction and also the fee petition.

23. In preparing this fee petition, I have exercised billing judgment in deleting time that was redundant or inefficient.

24. Please see Exhibit B to this Declaration for a true and accurate record of my time in the case after the exercise of billing discretion.

25. Stein & Vargas has also relied on paralegal assistance. In the exercise of billing discretion, Stein & Vargas has fully discounted paralegal time in this matter.

26. I declare under the penalties of perjury that the foregoing is true and correct.

Dated: August 23, 2023

s/Michael S. Stein  
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# EXHIBIT A

Michael Steven Stein

Curriculum Vitae

**Michael Steven Stein, J.D.**  
michael.stein@steinvargas.com

## EDUCATION

### *Harvard Law School*

- J.D. Degree, June 2006
- Notes Editor, *Harvard Law Review*

### *Princeton University*

- A.B. Degree, School of Public and International Affairs, June 2003
- Graduated *summa cum laude*
- Elected to membership in the Phi Beta Kappa Society

## PROFESSIONAL QUALIFICATIONS

Legal experience
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*STEIN & VARGAS, LLP*, Founding Partner (September 2009 to present)

- Represent individuals with a disability in carefully selected cases that establish national precedent in advancing the rights of individuals with a disability.

*DEAF LEGAL ADVOCACY WORLDWIDE*, Executive Director (August 2010 to present)

- Direct nonprofit organization that provides scholarships for deaf leaders around the world to receive legal training on the human rights of deaf people.

*NATIONAL ASSOCIATION FOR THE DEAF*, Skadden Fellow (September 2007 to September 2009)

- Conducted client intakes and litigated cases on the behalf of individuals who are deaf or hard of hearing in federal lawsuits around the country. Drafted comments in response to notices of proposed rulemaking by the Department of Justice and participated in meetings regarding revisions to the Americans with Disabilities Act (resulted in the Americans with Disabilities Amendments Act of 2008).

*UNITED STATES DISTRICT COURT, DISTRICT OF MASSACHUSETTS*, Law Clerk for the Honorable William G. Young (September 2006 to August 2007).

- Drafted bench memoranda and judicial opinions.

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## Teaching experience

GALLAUDET UNIVERSITY, Adjunct Faculty (August 2015 to December 2016)

- Taught courses in disability law and business law.

ROCHESTER INSTITUTE OF TECHNOLOGY, NATIONAL TECHNICAL INSTITUTE FOR THE DEAF, Lecturer (August 2011 to May 2015)

- Taught liberal arts courses in the College of Liberal Arts in criminal justice, politics, public policy, philosophy, and economics. Led study-abroad program to Chile to study the legal rights of deaf people in Chile.

## Bar Affiliations

- Massachusetts (2007)
- District of Columbia (2010)
- New York (2012)
- Virginia (2017)
- United States Court of Appeals, Second Circuit (2019)
- United States Court of Appeals, Seventh Circuit (2008)
- United States District Court, Western District of New York (2014)
- United States District Court, Northern District of New York (2015)
- United States District Court, District of North Dakota (2016)
- United States District Court, Eastern District of Virginia (2017)
- United States District Court, Southern District of New York (2018)
- United States District Court, Eastern District of New York (2018)
- United States District Court, Eastern District of Michigan (2020)
- United States District Court, Western District of Virginia (2021)

## Litigation Experience

### *APPELLATE BRIEFING EXPERIENCE*

Ramsay v. Nat'l Bd. of Med. Exam'rs, 968 F.3d 251 (3d Cir. 2020), *cert. denied*, 141 S. Ct. 1517 (2021).

- The Third Circuit held that a district court did not abuse its discretion in granting a motion for preliminary injunction against the National Board of Medical Examiners and in favor of a medical student with learning disabilities, when she

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had already failed Step 1 without accommodations, faced expulsion from medical school, had demonstrated a substantial likelihood of success on the merits, and the balance of hardships and public interest favored requiring NBME to provide her with the same testing accommodations she had in medical school.

Sierra v. Hallandale Beach II, 996 F.3d 1110 (3d Cir. 2021)

- The Eleventh Circuit held that a deaf individual had standing to sue a municipality for having inaccessible websites that he personally experienced.

Nat'l Ass'n of the Deaf v. State of Florida, et al., 980 F.3d 763 (11th Cir. 2020)

- The Eleventh Circuit held that Title II of the Americans with Disabilities Act validly abrogates sovereign immunity as applied to the lack of captioning for state legislative proceedings. Drafted successful appellate briefs.

J.D. v. Colonial Williamsburg Foundation, 925 F.3d 663 (4th Cir. 2019)

- In case of first impression, the Fourth Circuit held that a child with a gluten sensitivity was a person with a disability who had stated a claim of discrimination against a place of public accommodation that had refused to let him eat on its premises a gluten-safe meal that he had brought from home. Drafted successful appellate briefs.

Sierra v. Hallandale Beach I, 904 F.3d 1343 (11th Cir. 2018)

- The Eleventh Circuit held that the Communications Video Accessibility Act did not preempt the Americans with Disabilities Act or section 504 of the Rehabilitation Act or otherwise require exhaustion of remedies before such claims could be brought in court.

Argenyi v. Creighton University, 703 F.3d 441 (8th Cir. 2013)

- Drafted successful appellate briefs on the issue whether medical school must provide auxiliary aids and services such as interpreters to ensure full and equal access for a deaf medical student. The United States Court of Appeals for the Eighth Circuit held that medical schools must provide deaf students with an opportunity equal to that of their hearing classmates to benefit from educational programs.

Liese v. Indian River Memorial Hospital District, 701 F.3d 334 (9th Cir. 2012)

- Drafted successful *amicus curiae* brief on issue of standard of proof to establish violation of Rehabilitation Act of 1973 when a hospital fails to provide qualified sign language interpreters. The United States Court of Appeals for the Eleventh

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Circuit ruled for deaf plaintiffs in holding that deliberate indifference is sufficient to establish intentional discrimination and remanding for trial.

Goddard v. Harkins Amusement Enterprises, 603 F.3d 666 (9th Cir. 2010)

- Drafted successful *amicus curiae* brief on issue of first impression in appellate courts whether the Americans with Disabilities Act requires movie theaters to provide captioning. The United States Court of Appeals for the Ninth Circuit ruled for the deaf plaintiff in holding that the statute can require movie-theater captioning.

Germano v. International Profit Association, 544 F.3d 798 (7th Cir. 2008)

- Drafted successful appellate briefs and orally argued employment discrimination case presenting the novel question whether statements made through telecommunications relay services constitute hearsay. The United States Court of Appeals for the Seventh Circuit ruled for the deaf plaintiff in holding that statements made through relay can be admissible in evidence as proof of discrimination.

#### *REPRESENTATIVE DISTRICT COURT BRIEFING EXPERIENCE*

Reininger v. State of Oklahoma, et al., 292 F. Supp. 3d 1254 (W.D. Okla. 2017)

- Represented deaf individual in case against state legislature for not captioning legislative proceedings broadcast online.
- Successfully defended against a motion to dismiss, and defendants now caption legislative proceedings broadcast online.

Enos v. State of Arizona, et al., No. CV-16-00384-PHX-JJT, 2017 U.S. Dist. LEXIS 19268 (D. Ariz. Feb. 10, 2017)

- Represented deaf association and deaf individuals in case of first impression whether Title II of the ADA and Section 504 of the Rehabilitation Act require 911 service providers to accept text messages from deaf individuals who cannot place voice telephone calls to 911.
- Successfully defended against a motion to dismiss, reached public settlements with entities that resulted in 911 service providers in Maricopa County and throughout Arizona establishing text-to-911 services.

Featherstone v. Pacific Northwest University, No. 1:CV-14-3084-SMJ, 2014 U.S. Dist. LEXIS 102713 (E.D. Wash. July 22, 2014)

- Represent deaf medical student who was denied admission to osteopathy school based on his disability
- Successfully obtained preliminary injunction requiring osteopathy school to admit deaf student

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Prakel v. State of Indiana, Civ. A. No. 4:12-cv-45-SEB-WGH, 100 F. Supp. 3d 661 (S.D. Ind. 2015)

- Represented hearing mother and deaf son in lawsuit against state courts for not providing interpreters for deaf son who wanted to observe his mother's court cases.
- Court held that Title II of the ADA and section 504 of the Rehabilitation Act could require a state court to provide sign language interpreters for a deaf spectator.

Argenyi v. Creighton University, Civ. A. No. 8:09CV341, Docket Entry No. 424 (D. Neb. Dec. 19, 2013) (granting motion for injunctive relief).

- Deaf medical student sued university for not providing the necessary auxiliary aids and services to ensure effective communication. After jury verdict for Plaintiff, court granted motion for permanent injunction requiring medical school to provide interpreting and captioning services. Drafted more than 30 briefs in this case.

Howard v. Alabama Bd. of Pharmacy, Civ. A. No. 2:09-cv-1245-JHH, Docket Entry No. 10 (N.D. Ala. Aug. 31, 2009) (denying motion to dismiss).

- Represented deaf pharmacist in lawsuit against state board of pharmacy for refusing to permit her to accept prescription orders through telecommunications relay services.
- Successfully defended against a motion to dismiss.
- Defendant agreed to modify policy to permit deaf pharmacist to accept prescription orders through telecommunications relay services.

Mosier v. Commonwealth of Kentucky, 675 F. Supp. 2d 693 (E.D. Ky. 2009) (denying summary judgment for defendants); 640 F. Supp. 2d 875 (E.D. Ky. 2009) (denying defendants' motion to dismiss); Civ. A. No. 08-184-KSF, 2008 U.S. Dist. LEXIS 69647 (E.D. Ky. Sept. 11, 2008) (denying defendant's motion to dismiss).

- Represented deaf attorney in lawsuit against Commonwealth of Kentucky for failing to provide interpreter services during her court appearances.
- Successfully defended against three dispositive motions (two motions to dismiss and one motion for summary judgment).
- Defendants agreed to modify policy to provide interpreters for deaf attorney's court appearances.

Publications
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Stein, M. (2015). Implementing the Convention on the Rights of Persons with Disabilities: Supporting the deaf community in Chile through legal expertise. In M. Friedner & A. Kunsters, Eds, *It's a Small World: Inquiries into International Deaf Spaces*. Washington, DC: Gallaudet University Press.

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Stein, M. (September 2012). Be your own best advocate when applying for employment in the medical field. Association of Medical Professionals with Hearing Losses. *Pulse*, 9.

Stein, M. (September 2011). Does the use of telecommunications relay services violate HIPAA? Association of Medical Professionals with Hearing Losses. *Pulse*, 17.

Stein, M. & Teplin, E. (2011). Rational discrimination and shared compliance: Lessons from Title IV of the Americans with Disabilities Act. *Valparaiso University Law Review*, 45, 1095-1141.

Stein, M. (2005). District court approves settlement requiring movie theaters to provide closed captioning for deaf and hard of hearing people. *Harvard Law Review*, 118, 1777-1784.

National Presentations
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Stein, M. (2017, June 10). The Legal Rights of Deaf and Hard of Hearing Health Care Professionals. *Association of Medical Professionals with Hearing Losses Conference*. Lecture conducted from Rochester, NY.

Stein, M. (2015, May 16). The Legal Rights of Deaf and Hard of Hearing Health Care Professionals. *Association of Medical Professionals with Hearing Losses Conference*. Lecture conducted from Ann Arbor, MI.

Stein, M., Bailey, B. & Furman, S. (2014, July 2). The ADA and VRI. *National Association of the Deaf Conference*. Lecture conducted from Atlanta, GA.

Rosen-Singleton, S., Stein, M., *et al.* (2014, July 2). Deaf Attorney Panel. *National Association of the Deaf Conference*. Panel discussion conducted from Atlanta, GA.

Rubel, L., Toscano, R.M., Kelstone, A., Roepke, S., Simpson, T., Stein, M. & Thoms, C. (2013, June 27). Enhancing Student Learning Through a Writing in the Disciplines Initiative. *Convention of the American Instructors of the Deaf Conference*. Panel discussion conducted from National Technical Institute for the Deaf, Rochester, NY.

Stein, M. (2013, April 7). The Legal Rights of Deaf and Hard of Hearing Health Care Professionals. *Association of Medical Professionals with Hearing Losses Conference*. Lecture conducted from Austin, TX.

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Stein, M. (2011, August 6). The Legal Rights of Deaf and Hard of Hearing Health Care Professionals. *Association of Medical Professionals with Hearing Losses Conference*. Lecture conducted from Portland, OR.

Rosen-Singleton, S., Stein, M., *et al.* (2011, July 9). *National Association of the Deaf Convention*. Panel discussion conducted from Philadelphia, PA (discussion on the rights of deaf people).

Rosen-Singleton, S., Stein, M., *et al.* (2008, July). Equality in Today's World. *National Association of the Deaf Convention*. Panel discussion conducted from New Orleans, LA.

Community Presentations
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Stein, M. (2018, Oct. 21). Legal Vocabulary. *Missouri Commission for the Deaf and Hard of Hearing Annual Conference*. Lecture conducted from Lake of the Ozarks, MO.

Stein, M. (2018, Oct. 20). The Criminal Justice System and the Challenge of Communication Access. *Missouri Commission for the Deaf and Hard of Hearing Annual Conference*. Lecture conducted from Lake of the Ozarks, MO.

Stein, M. (2017, Sept. 21). Introduction to Disability Rights. *Hearing Loss Association of America, Rappahannock Chapter*, Lecture conducted from Fredericksburg, VA.

Stein, M. (2017, December 2). Introduction to Disability Rights. Lecture conducted from Germantown, MD.

Stein, M. & Lafferty, M. (2017, October 14-15). Introduction to Disability Rights. Lectures conducted from Cookeville, TN and Nashville, TN.

Stein, M. (2017, September 21). Introduction to Disability Right. Lecture conducted from the disAbility Resource Center, Fredericksburg, VA.

Stein, M. (2014, November 18). Proposed Regulations for Captioning in Movie Theaters. Lecture conducted from National Technical Institute for the Deaf, Rochester, NY.

Pollard, R. & Stein, M. (2014, September 5). *Deaf Strong*. Workshop conducted from the University of Rochester School of Medicine, Rochester, NY (workshop on deaf people for medical students).

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Panko, T., Pollard, R., Smith, S. & Stein, M. (2013, November 20). Health Career Panel. Panel discussion conducted from National Technical Institute for the Deaf, Rochester, NY.

Stein, M. (2012, November 12). Tale of Two ADAs: Rational Discrimination and Shared Compliance. *Department of Liberal Studies Scholarship and Practice Kickoff*. Lecture conducted from National Technical Institute for the Deaf, Rochester, NY.

Stein, M. (2012, September 28). The ADA and You. *Rochester Deaf Awareness Week*. Lecture conducted from Rochester Recreation Club for the Deaf, Rochester N.Y.

Stein, M. (2012, July 23). How To Think Like an ADA Lawyer. Lecture conducted from Valley Center of the Deaf, Apache ASL Trails, Tempe, AZ.

Hlibok, G. & Stein, M. (2009, March). The Deaf and the Law. Lecture conducted from University of Virginia, Charlottesville, VA.

Rosen-Singleton, S., Brick, K., Hlibok, G., Rosen, J. & Stein, M. (2007, November). Living in an Accessible World: A Possible Reality or Just a Dream? *Maryland Association of the Deaf Convention*. Lecture conducted from Rockville, MD.

#### International Conferences Organized

Acuña, X., Marin, J.L. & Stein, M. (Chairs). (2015, January 5-6). *Intercambio de Experiencias de Jóvenes Sordos en la Educación Superior (Exchange of Experiences of Deaf Students in Higher Education)*. Santiago, Chile: Universidad Metropolitana de Ciencias de la Educación.

Acuña, X., Clymer, E., Marin, J.L. & Stein, M. (Chairs). (2014, January 16). *Experiencias y Desafíos en la Formación de las Personas Sordas para la Vida Laboral (Experiences and Challenges in the Education of Deaf People for the Workforce)*. Santiago, Chile: Universidad Metropolitana de Ciencias de la Educación.

#### International Presentations

Stein, M., Sierralta, V., Panji, M.A., & Duorinaah, J. (2019, July 26). Training Deaf Leaders To Become Lawyers Advocating for the Human Rights of Deaf People. *World Federation of the Deaf Congress*. Lecture conducted from Paris, France.

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Stein, M., Angdika, P., & Muchlisin, D. (2018, January). Seminar Hukum Tuli (Deaf Rights Workshop). Lectures conducted from Indonesia in Yogyakarta, Solo, Wonosobo, Semarang, Singkawang, and Pontianak.

Stein, M. (2018, January 6). Focus Group Discussion on the United Nations Convention on the Rights of Persons with Disabilities. Singapore Association for the Deaf, Singapore.

Stein, M. (2018, January 3). Disability Law. Lecture conducted from Chongqing Normal University, Chongqing, China.

Stein, M. (2017, November 3). Disability Law. Lecture conducted from New Bulgaria University, Sofia, Bulgaria.

Stein, M & Effendi, J. (2017, July-August). Memahami Dasar Hukum dan Hak Tuli dalam Undang-undang Nomor 8 Tahun 2016 (Understanding the Legal Rights of Deaf People in Law No. 8, Year 2016). Lectures conducted from Indonesia in Jakarta and Yogyakarta.

Stein, M, Angdika, P, Muhandis, F., Rahmania, A., & Rodiah, S. (2017, March). Memahami Dasar Hukum dan Hak Tuli dalam Undang-undang Nomor 8 Tahun 2016 (Understanding the Legal Rights of Deaf People in Law No. 8, Year 2016). Lectures conducted from Indonesia in Jakarta, Denpasar, Makassar, Yogyakarta, and Bandung.

Stein, M. (2017, February 24). Lecture conducted from Chinese University of Hong Kong, Hong Kong (lecture on the Convention on the Rights of Persons with Disabilities).

Stein, M. (2017, February 3). Lecture conducted from Auditorio Ministerio Obras Publicas, La Serena, Chile (lecture on the Convention on the Rights of Persons with Disabilities).

Stein, M. (2017, January 30). Lecture conducted from Biblioteca Providencia, Santiago, Chile (lecture on the human rights of deaf people).

Stein, M. (2013, July 30). Lecture conducted from Universidad de Aconcagua, Calama, Chile (lecture on U.S. disability law and deaf attorneys).

Stein, M. (2013, July 20). Lecture conducted from Universidad Metropolitana de Ciencias de la Educación, Santiago, Chile (lecture on human rights of deaf people).

Stein, M. (2010, November 18). Disability Law in the United States. Lecture conducted from the Association of the Deaf in Israel, Helen Keller Center, Tel Aviv, Israel.

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Stein, M. (2010, November 10). The Ethics of Disability. Lecture conducted from Hebrew University, Jerusalem, Israel.

Stein, M. (2010, November 8). Deaf-Blind People in the United States. Lecture conducted from the Center for Deaf-Blind Persons, Helen Keller Center, Tel Aviv, Israel.

Ayala, F. & Stein, M. (2010, June 9). Lecture conducted from Universidad Metropolitana de Ciencias de la Educación, Santiago, Chile (lecture on audism).

Stein, M. Lectures conducted throughout Chile on the human rights of deaf people at the following institutions from December 2009 through June 2010:

- Instituto de Santo Tomás, Temuco, Chile
- Universidad Mayor, Temuco, Chile
- Universidad del Mar, Temuco, Chile
- Asociación Regional de Sordos de Temuco, Temuco, Chile
- Asociación de Sordos de Curicó, Curicó, Chile
- Agrupación de Discapacidades Auditivos, La Serena, Chile
- Asociación de Sordos de Atacama, Copiapó, Chile
- Asociación de Sordos de Loa, Calama, Chile
- INACAP, Iquique, Chile
- Instituto de Santo Tomás, Iquique, Chile
- Organización de Jóvenes y Adultos Sordos de Iquique, Iquique, Chile
- Organización de Jóvenes y Adultos Sordos de Arica, Arica, Chile
- Asociación de Sordos de Coyhaique, Coyhaique, Chile
- Asociación Regional de Sordos, Concepción, Chile
- Asociación de Sordos en Punta Arenas, Punta Arenas, Chile

Sierralta, V. & Stein, M. (2010, May 3). Lecture conducted from Café Arte, Calama, Chile (lecture on audism).

Stein, M. (2010, March 26). Lecture conducted from Asociación de Sordos del Uruguay, Montevideo, Uruguay (lecture on the human rights of deaf people).

Stein, M. (2009, November 18). ¿Cuáles Deben Ser los Derechos Legales de las Personas Sordas? (What Should the Rights of Deaf People Be?). *Congreso Nacional de Profesores e Intérpretes de Lengua de Señas Chilena (National Conference of Teachers and Interpreters of Chilean Sign Language)*. Lecture conducted from Universidad Católica, Santiago, Chile.

Stein, M. (2009, July 23). *Campamento de la Unión Nacional de Sordos de Mexico*. Lecture conducted from Tulum, Mexico (lecture on self-advocacy by deaf people).

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Marin, J.L., Ayala, F. & Stein, M. (2009, May 29). Foro: Audismo al Descubierto (Forum: Audism Unveiled). *Ciclo Documentales Sordos*. Panel discussion conducted from Instituto Chileno-Norteamericano, Santiago, Chile.

Stein, M. (2009, May 29). Lecture conducted from Ministerio de Educación (Ministry of Education), Santiago, Chile.

Stein, M. (2009, May 23). Lecture conducted from Ciudadanía Real de Sordos, Santiago, Chile (lecture on the legal rights of deaf people in the United States).

Stein, M. (2008, November). Los Derechos de los Sordos Estadounidenses (The Rights of Deaf People in the United States). *Congreso Nacional por los Derechos del Sordo* (National Convention on the Rights of the Deaf). Lecture conducted from Monterrey, Mexico.

# EXHIBIT B

**Sampson v. Stony Brook**

<b>Date</b>	<b>Time</b>	<b>Description</b>
7/6/2022	0.4	Review documents in case, note factual questions for follow-up
7/6/2022	1.8	Research case law on ADA/section 504 cases concerning time limits for completing medical school requirements
7/6/2022	1.0	Zoom call with Vargas/Weiner to review factual record, discuss legal strategy for preliminary injunction
7/7/2022	2.1	Continue to research case law on ADA/section 504 cases concerning time limits for completing medical school requirements
7/7/2022	0.1	Review AAMC literature on data re: medical school graduation/timelines
7/7/2022	3.6	Begin drafting preliminary injunction brief: introduction, factual background, legal analysis (four factors for preliminary injunction), conclusion
7/7/2022	0.1	Email Vargas/Weiner flagging litigation strategy issues to resolve as part of preliminary injunction briefing
7/11/2022	0.2	Zoom call with Vargas discussing strategy for preliminary injunction briefing/affidavits
7/11/2022	0.9	Revise draft preliminary injunction brief -- sections on irreparable harm/balance of hardships/public interest
7/11/2022	0.6	Revise draft preliminary injunction brief -- section on likelihood of success on the merits
7/14/2022	1.0	Revise draft complaint against Stony Brook
7/14/2022	0.2	Zoom call with Vargas re: strategy for preliminary injunction
7/25/2022	0.3	Zoom with Vargas re: strategy for preliminary injunction
7/25/2022	0.6	Revise draft preliminary injunction brief
7/26/2022	0.6	Revise draft complaint
7/26/2022	0.5	Revise draft preliminary injunction brief -- facts section
7/27/2022	0.1	Revise draft complaint
7/28/2022	0.9	Revise draft complaint
7/28/2022	0.7	Draft supporting declaration in support of preliminary injunction motion
7/29/2022	1.6	Revise draft preliminary injunction brief
7/29/2022	0.1	Revise draft preliminary injunction motion, proposed order
7/29/2022	0.3	Review, provide feedback on draft declaration for preliminary injunction brief
7/29/2022	0.1	Discuss with co-counsel which exhibits to use for preliminary injunction motion
7/29/2022	0.4	Revise draft complaint
8/16/2022	0.1	Draft email memo to co-counsel re: university president as defendant
9/5/2022	0.1	Draft email memo to co-counsel re: university president as defendant
9/13/2022	0.4	Draft email memo re: strategy for responding to Stony Brook's brief opposing PI motion
9/15/2022	1.0	Stony Brook reply brief -- review Stony Brook's emphasized cases, draft outline for reply brief
9/18/2022	2.3	Begin drafting reply brief in support of preliminary injunction against Stony Brook

9/20/2022	1.2	Revise draft reply brief in support of preliminary injunction against Stony Brook
9/21/2022	0.1	Email correspondence with Vargas/Weiner about revising draft reply brief in support of preliminary injunction against Stony Brook
9/23/2022	2.4	Revise draft reply brief in support of preliminary injunction against Stony Brook
12/5/2022	0.1	Draft email memo to Vargas re: likely next steps by Stony Brook re: motion for preliminary injunction
12/12/2022	0.1	Draft email memo to Vargas re: Stony Brook negotiations
12/13/2022	0.1	Draft email memo to Vargas re: Stony Brook negotiations
12/18/2022	0.6	Review draft agreement from Stony Brook, draft memo to Vargas re: negotiation strategy
12/19/2022	0.1	Email with Vargas re: negotiation strategy for resolving case with Stony Brook
12/20/2022	0.1	Draft email memo to Vargas re: Stony Brook negotiations
1/24/2023	0.1	Draft email memo to Vargas re: strategy for negotiations with Stony Brook
1/25/2023	0.1	Draft email memo to Vargas re: strategy for negotiations with Stony Brook
5/1/2023	0.6	Revise draft SUNY agreement, draft strategy emails to Vargas/Weiner re: SUNY negotiations
5/1/2023	0.2	Draft email memo to Vargas/Weiner re: strategy for factual findings
5/3/2023	0.3	Draft email memos to Vargas/Weiner re: stipulation/order in Stony Brook case re: August 2024 graduation
5/23/2023	0.1	Draft email memo to Vargas re: Stony Brook's arguments re: fees
5/24/2023	0.2	Review draft agreement from Stony Brook, draft email memo to co-counsel
6/13/2023	0.1	Draft strategy email to Vargas re: status conference set for 6/13
6/13/2023	0.1	Draft strategy email to Vargas re: negotiations
6/13/2023	0.2	Revise draft letter to SB's counsel re: topics to address post-court conference
6/15/2023	0.1	Draft email to Vargas/Weiner re: negotiation strategy
6/15/2023	0.1	Draft email to Vargas/Weiner re: negotiation strategy
6/22/2023	0.1	Draft email to Vargas re: strategy for fee petition
7/6/2023	0.3	Review, provide feedback (incorporated) on draft agreement to send SB
7/7/2023	0.1	Draft email memo to Vargas/Weiner re: strategy re: negotiations
7/8/2023	0.1	Draft email to co-counsel re: proposed terms
7/10/2023	0.3	Review, draft strategy email to co-counsel on draft agreement
8/3/2023	0.2	Zoom call with Mary discussing case developments/strategy
8/8/2023	0.2	Review, provide feedback on draft declaration in support of fee petition
8/11/2023	0.2	Review, provide feedback on draft declaration in support of fee petition
8/14/2023	0.5	Review transcripts of conferences in Sampson v. Stony Brook case
8/14/2023	2.9	Begin drafting fee petition
8/17/2023	0.4	Review case law, draft email memo to Mary re: strategy for SB fee petition
8/17/2023	0.1	Review, provide feedback on draft declaration in support of fee petition

8/17/2023	1.5	Revise fee petition -- section on reasonableness of fees (0.2), section on prevailing party status (0.9), facts section (0.4)
8/21/2023	0.2	Review, provide feedback on draft declaration in support of fee petition
8/21/2023	1.3	Revise fee petition -- global edits throughout to streamline argument, revise introduction, add citations
8/21/2023	0.2	Review, provide feedback on draft declarations in support of fee petition
8/22/2023	0.6	Zoom call with Vargas discussing/revising draft fee petition
8/22/2023	0.7	Review, provide feedback on draft declarations in support of fee petition
8/22/2023	0.4	Revise draft fee petition
8/22/2023	0.5	Review, provide feedback on draft exhibits in support of fee petition
8/23/2023	1.0	Final proofread/revisions to fee petition

**Total 40.9**

**@ \$425/hour \$17,382.50**